BEFORE THE PUBLIC UTILITIES COMMISSION OF THE FILE STATE OF CALIFORNIA 09-18-07 02:49 PM

Order Instituting Rulemaking Regarding Policies,)	
Procedures and Rules for the California Solar)	Rulemaking 06-03-004
Initiative, the Self-Generation Incentive Program)	(Filed March 2, 2006)
and Other Distributed Generation Issues.)	
)	

COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS ON PETITION FOR MODIFICATION OF METERING INDEPENDENCE REQUIREMENTS

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I.

INTRODUCTION

Pursuant to ALJ Duda's September 4, 2007 Ruling Requesting Comments on Petition for Modification of Metering Independence Requirements (Ruling), Southern California Edison Company (SCE) submits the following comments on the Ruling and the attached Instructions for Qualifying as a Performance Data Provider (PDP Proposal). In Decision (D.) 06-08-028, the Commission held that entities providing performance monitoring and reporting services (PMRS) must be independent from the solar industry. The Ruling seeks comments on the Petition for Modification's recommendation to remove the independence requirements for PMRS entities. The Ruling contains an attachment with proposed instructions for qualifying as a performance data provider (PDP) for the CSI. SCE is concerned that the PDP Proposal does not contain sufficient detail to be implemented in a timely manner, and does not take into consideration the scheduled roll-out of the utilities' Advanced Metering Infrastructure (AMI) programs.

SCE recognizes the immediate need for near-term solutions for gathering PBI data and establishing a cost-effective, workable metering framework for the CSI. In these comments, SCE proposes that, in the context of determining the independence requirements for the PMRS, the Commission should distinguish between the two functions that a PMRS entity could provide: (1) meter reading and data services for the payment of Performance-Based Incentives (PBI); and (2) feedback to customers concerning the overall performance of their systems.

For the PBI data services function, SCE recommends that the Commission take a simplified approach to performance monitoring for purposes of gathering information for PBI payments, and delegate that task and function to the Program Administrators in their role as independent administrators of the CSI program. However, SCE would only be able to carry out this function with appropriate metering. To facilitate this proposal, SCE again recommends that the Commission require all systems receiving a CSI incentive to install a meter socket and allow the Program Administrators to determine the best fit, least cost metering that will serve the data collection and incentive payment requirements of the program.

For the customer feedback function, SCE believes that the Commission should establish some minimum performance monitoring requirement(s), and allow customers to look to any available data provider, including both independent PMRS providers and solar industry installers and manufacturers, to meet that minimum requirement.

In light of the complexity of the PDP Proposal, SCE urges the Commission to adopt these low cost solutions that will satisfy the goals of the CSI program.

II.

COMMENTS

A. The PDP Proposal Lacks the Detail Necessary to Implement the PDP Framework in a Timely and Cost-Effective Manner.

As mentioned above, the Ruling attaches a proposal that provides a list of instructions for qualifying PDPs for the CSI program. The PDP Proposal appears to be a high-level framework

for establishing third-party performance monitoring service providers. SCE is concerned that the PDP Proposal lacks sufficient detail concerning how the framework would be practically implemented. For example, the generalized requirements in the PDP Proposal deal with the handling and transfer of data but do not contain sufficient detail to ensure a successful integration between the PDP and Program Administrator information technology systems. Additionally, the PDP Proposal sets forth general PDP applicant qualifications such as requiring that the PDP "possess technical expertise and capability," yet the PDP Proposal does not set forth what standards, if any, should be applied in determining whether PDP applicants meet this – and other – qualifications. Further, the Ruling references the Direct Access Standards for Metering and Meter Data (DASMMD), yet is it not clear to what extent DASMMD standards were incorporated into the PDP Proposal, or how the Program Administrators should make use of these standards in developing the PDP qualifications. It is also unclear how the Program Administrators would conduct audits of the data provided by a PDP, or how certain penalties would be enforced should discrepancies be noted. SCE is also concerned that there is no discussion of the integration of performance monitoring services with the roll-out of AMI in each of the utilities' service territories. As SCE has previously noted, its Edison SmartConnectTM meters will provide for equivalent performance monitoring and communication capabilities without the need for PDPs or the stranded costs associated with an extensive new performance monitoring infrastructure.

Each of these issues, and others, will take significant time and resources to address. In light of the complexity of the PDP Proposal, SCE urges the Commission to take an alternative, simplified approach that begins with distinguishing between the two functions of performance monitoring – (1) PBI payment data; and (2) customer feedback – and adopt simplified, low cost, near-term solutions that will satisfy the goals of the CSI program. Under SCE's approach, the

For example, the PDP Proposal states that PDPs may be assessed a "10% penalty" if audits discover discrepancies in PBI reads. SCE is unsure of what this penalty would consist of, and what accounting the penalty fees should receive.

independent Program Administrators would be tasked with gathering metered output data for purposes of PBI payments. The customer feedback function would be left to any appropriate service provider, including solar industry providers, as determined by the customer.

B. The CSI Program Administrators Should Have Responsibility for Obtaining Metered Output Data for Calculating PBI Payments.

SCE recommends that the Commission task the Program Administrators with responsibility for installing utility grade metering, obtaining metered output for purposes of PBI payment, and processing monthly incentive payments. If any Program Administrator determines for business reasons that it is unable to serve these functions individually, then that Program Administrator may contract out the metering installation and reading to a qualified third party that meets the utility's and/or Program Administrator's standards for reliability, accuracy, and safety. Tasking the Program Administrators with responsibility for all aspects of PBI payment has many advantages. First, the Program Administrators are already responsible for making PBI payments. By tasking the Program Administrators with meter installation and meter reading,² the Program Administrator can ensure that it has compatible metering and information systems as well as independent, accurate data upon which ratepayer-funded PBI payments can be made. The Commission will avoid the need for information audits, or extensive new data infrastructures that may be rendered useless with the implementation of AMI. For SCE to fulfill this function, however, appropriate metering must be in place.

In SCE's May 16, 2006 comments on the Staff Proposal for California Solar Initiative Design and Administration 2007-2016, SCE recommended a simple and low cost interim solution for performance monitoring prior to the deployment of AMI. There, SCE recommended

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Or, as stated above, with the discretion to contract with a third party who meets the Program Administrator's specific requirements. There are already a number of MDMA-certified metering service providers that read Direct Access customers' meters, and who meet the requirements of the utilities concerning reliability, accuracy, and safety.

that the Commission require all systems receiving a CSI incentive to install a meter socket² and then allow the Program Administrators to determine the best fit metering that will serve the data collection and incentive payment needs of the program, while also minimizing any stranded costs that will occur when the utilities roll out their respective AMI programs. SCE continues to believe that this is the best and least-cost approach. If this approach was adopted, SCE would be able to accurately, reliably, and safely determine the generation output of the solar energy system through a revenue grade meter of its choice, and then use the data to calculate and distribute PBI payments to customers.

Moreover, installing a meter socket for all other Expected Performance-Based Buydown (EPBB) solar energy systems at the time of system installation is a low cost way to preserve a customer's ability to install an Edison SmartConnect™ meter or other revenue grade meter for future performance reporting and/or accurate measurement of output for renewable energy credits (RECs). With the recent adoption of the lower meter accuracy requirement of +/- 5% for EPBB incentive recipients, solar energy system owners may not meet the requirements of the Western Renewable Energy Generation Information System (WREGIS) for REC certification, and they may not understand the implications of choosing a system design that only provides for an inverter meter with +/- 5% accuracy. Further, as AMI programs are rolled out, next generation metering technologies may displace manually read meters. Having a ready meter socket in place will provide the ability to more easily install next generation metering technology which can provide performance monitoring and communication capabilities. For these reasons, SCE recommends requiring an additional meter socket at the time of system installation as a low-cost way to preserve the option to install a separate revenue grade meter at a later date, if desired by the customer or the Commission.

SCE reads more than 4.5 million meters today, and has rigid safety, reliability, and accuracy standards in place that negate the need for establishing complex and costly third party

Such meter socket would be located next to the utility billing meter and disconnect switch to facilitate generation output meter reading at the time regular billing meter reads are obtained.

PDP qualifications, procedures, and systems. Costs of administering all aspects of PBI payments, including meter installation and meter reading, are appropriately recovered through each Program Administrator's administration budget. SCE urges the Commission to reject the PDP Proposal in favor of requiring the Program Administrators to administer all aspects of PBI payments.

C. The Commission Should Adopt Separate Minimum Performance Reporting for Customer Education and Feedback.

As provided above, the PBI performance reporting function can be handled very effectively using existing utility models. The second function of performance reporting – customer education and feedback – should be separated from the first function, and can be achieved through numerous means. In D.06-08-028, the Commission stated:

"Performance feedback to owners of systems...including residential customers, is consistent with the CSI program objective of achieving high performance solar technologies. Performance data will provide valuable feedback to customers so they can maximize the value of their solar investment systems. Further, if a feedback loop leads to a higher performance system, ratepayers ultimately benefit as well by ensuring a payoff from their incentive investment."

SCE supports efforts to increase customers' awareness of their energy production and consumption. The Commission may facilitate this awareness through a range of methods by which system performance can be communicated to customers. For example, the Commission may consider requiring solar providers to offer a basic performance display in an easy-to-see location before a project can receive CSI funding. The Commission may also elect to require more extensive performance reporting, such as monthly or yearly reports of data. In this event, such functions can be provided by any number of entities, including independent PMRS providers, as well as solar installers and manufacturers. When AMI is available, or potentially as

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⁴ D06-08-028, p. 78.

new business models emerge, the Commission should also consider allowing SCE the voluntary option of participating as an independent PMRS provider.

If customers are to bear the cost of customer feedback performance reporting, SCE recommends that the Commission adopt the low cost minimum requirement of an easy-to-read customer performance display that will help customers understand how their solar energy system is performing at any given time, and then allow customers to elect whether more extensive and sophisticated performance monitoring devices are cost-beneficial.

D. If the Commission Elects to Adopt the PDP Proposal Instead of SCE's Recommended Alternative Framework, SCE Recommends that the Commission Revise Implementation Timelines to Ensure Adequate Time to Address Proposal Details.

As provided above, SCE urges the Commission to reject the PDP Proposal in favor of requiring the Program Administrators to administer all aspects of PBI payments, and allowing more flexible customer communication options. If the Commission elects to adopt the PDP Proposal notwithstanding SCE's comments, SCE recommends that the Commission revise implementation timelines to ensure adequate time to address the details of the proposal. The PDP Proposal requires that each Program Administrator publish an ANSI X.12 Electronic Data Interchange 867 protocol (EDI 867) implementation guide for CSI PBI data specific to their respective requirements by November 1, 2007. This timeline does not appear workable in light of the fact that reply comments on this proposal will not be submitted until September 24, 2007. SCE's experience is that system changes and data transfers between third party systems and SCE systems require sufficient lead times under a well defined project schedule. SCE recommends that if the PDP Proposal is adopted, necessary clarifications be made to the Proposal and sufficient time (e.g., six months or more) be allowed to provide for full compliance.

III.

CONCLUSION

SCE appreciates the opportunity to provide comments on the Ruling. As provided above, SCE recommends that the Commission reject the PDP Proposal, and instead adopt SCE's simplified approach:

- ➤ The Commission should require all solar energy systems receiving a CSI incentive to install a meter socket for PBI revenue grade metering and/or accurate revenue grade metering for REC certification or Commission information needs.
- The Commission should task the Program Administrators with meter installation and meter reading required for PBI payments. If a Program Administrator does not want to fulfill this function individually, the Program Administrator may contract with a qualified third party who meets the Program Administrator's standards for accuracy, reliability, and safety.
- ➤ The Commission should require every solar energy system receiving a CSI incentive to have an accessible, easy-to-read display that will allow the customer to see how the system is performing at any given time.

SCE commits to working with the Commission and interested parties to establish both near term and long term solutions for gathering PBI data and to facilitate a cost-effective, workable metering framework for the CSI.

Respectfully submitted,

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September 18, 2007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) ON ADMINISTRATIVE LAW JUDGE'S RULING REQUESTING COMMENTS ON PETITION FOR MODIFICATION OF METERING INDEPENDENCE REQUIREMENTS on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this 18th day of September, 2007, at Rosemead, California.

/s/ CHRISTINA SANCHEZ

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SMITA GUPTA CALIFORNIA ENERGY COMMISSION 1516 NINTH STREET, MS-25 SACRAMENTO, CA 95814 R.06-03-004 JAN HAEMNNIG PACIFIC POWER MANAGEMENT 12970 EARHART AVE. SUITE 110 AUBURN, CA 95602 R.06-03-004 STUART HALLIN REC SOLAR 684 CLARION CT. SAN LUIS OBISPO, CA 93401 R.06-03-004

TOM HAMILTON MANAGING PARTNER ENERGY CONCIERGE SERVICES 321 MESA LILA RD GLENDALE, CA 91208 R.06-03-004

ROBERT HAMMON CONSOL 7407 TAM OSHANTER DRIVE, SUITE 200 STOCKTON, CA 95210 R.06-03-004 JANICE G. HAMRIN CENTER FOR RESOURCE SOLUTIONS PO BOX 29512 SAN FRANCISCO, CA 94129 R.06-03-004

ARNO HARRIS RECURRENT ENERGY, INC. 220 HALLECK ST., SUITE 220 SAN FRANCISCSO, CA 94129 R.06-03-004 JOSHUA HARRIS LAW OFFICES OF STEPHAN C. VOLKER 436 14TH STREET, SUITE 1300 OAKLAND, CA 94612 R.06-03-004 PHILLIPE HARTLEY GENERAL MANAGER PHAT ENERGY 1215 FLANDERS ROAD LA CANADA, CA 91011 R.06-03-004

LYNN M. HAUG ATTORNEY AT LAW ELLISON & SCHNEIDER 2015 H STREET SACRAMENTO, CA 95814 R.06-03-004

JOSEPH HENRI 31 MIRAMONTE ROAD WALNUT CREEK, CA 94597 R.06-03-004 ROB HENRY OPERATIONS DIRECTOR DC POWER SYSTEMS 30 C MILL STREET HEALDSBURG, CA 95448 R.06-03-004

Tuesday, September 18, 2007

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GARY HINNERS RELIANT ENERGY, INC. PO BOX 148 HOUSTON, TX 77001-0148 R.06-03-004 DAVID HOCHSCHILD PV NOW 3857 - 20TH STREET SAN FRANCISCO, CA 94114 R.06-03-004

TOM HOFF CLEAN POWER RESEARCH 10 GLEN CT. NAPA, CA 94558 R.06-03-004 ANDREW J. HORN VAN HORN CONSULTING 12 LIND COURT ORINDA, CA 94563-3615 R.06-03-004 HEATHER HUNT LAW OFFICE OF HEATHER HUNT 242 WHIPPOORWILL LANE STRATFORD, CT 6614 R.06-03-004

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R.06-03-004

EPIC INTERN EPIC/USD SCHOOL OF LAW 5998 ALCALA PARK SAN DIEGO, CA 92110 R.06-03-004

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BRUNO JEIDER BURBANK WATER & POWER 164 WEST MAGNOLIA BLVD. BURBANK, CA 91502 R.06-03-004

JOHN JENSEN PRESIDENT MOUNTAIN UTILITIES PO BOX. 205 PO BOX. 205 KIRKWOOD, CA 95646 R.06-03-004

EDDIE JIMENEZ DIRECTOR SPECIAL PROGRAMS PORTEUS INC. 1830 N. DINUMB BLVD VISALIA, CA 93291 R.06-03-004

MARK JOHNSON GOLDEN SIERRA POWER PO BOX 551432 SOUTH LAKE TAHOE, CA 96155 R.06-03-004

MARC D. JOSEPH ATTORNEY AT LAW ADAMS BROADWELL JOSEPH & CARDOZA 601 GATEWAY BLVD., STE. 1000 SOUTH SAN FRANCISCO, CA 94080 R. 06-03-004 Shayle Kann CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5021 SAN FRANCISCO, CA 94102-3214 R.06-03-004 EVELYN KAHL ATTORNEY AT LAW ALCANTAR & KAHL, LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R.06-03-004

Tuesday, September 18, 2007

JOSEPH M. KARP ATTORNEY AT LAW WINSTON & STRAWN LLP 101 CALIFORNIA STREET SAN FRANCISCO, CA 94111-5802 R.06-03-004

CAROLYN KEHREIN ENERGY MANAGEMENT SERVICES 1505 DUNLAP COURT DIXON, CA 95620-4208 R.06-03-004

DAVID KOPANS FAT SPANIEL TECHNOLOGIES, INC. 2 PRINCETON ROAD ARLINGTON, MA 2474 R.06-03-004

MICHAEL KYES 7423 SHAUN CT. SEBASTOPOL, CA 95472 R.06-03-004

ERIC LARSEN ENVIRONMENTAL SCIENTIST RCM INTERNATIONAL, L.L.C. PO BOX 4716 BERKELEY, CA 94704 R.06-03-004

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KENNY KLEINERMAN MANAGER, MARKETING COMMUNICATIONS SOLEL, INC. 701 NORTH GREEN VALLEY PARKWAY HENDERSON, NV 89074 R.06-03-004

KEN KRICH PRESIDENT CALIF. INST. FOR ENERGY AND ENVIRONMENT 1333 BROADWAY, SUITE 240 OAKLAND, CA 94612 R.06-03-004

PAUL LACOURCIERE ATTORNEY AT LAW THELEN REID BROWN RAYSMAN & STEINER LLP 101 SECOND STREET, SUITE 1800 SAN FRANCISCO, CA 94105 R 06-03-004

ROD LARSON LARSON CONSULTING SERVICES 973 E. FRONT STREET VENTURA, CA 93001 R.06-03-004

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SOUTH COAST AIR QUALITY MANAGEMENT
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R.06-03-004

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PAUL KUBASEK SOUTHERN CALIFORNIA EDISON 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R.06-03-004

JOSE LANDEROS PROTEUS, INC. 1830 N. DINUBA BLVD VISALIA, CA 93290 R.06-03-004

ROGER C. LAUBACHER PV POWERED INC. 150 SW SCALEHOUSE LOOP NO. 101 BEND, OR 97702 R.06-03-004

ROBERT F. LEMOINE SOUTHERN CALIFORNIA EDISON COMPANY 2244 WLNUT GROVE AVENUE ROSEMEAD, CA 91770 R.06-03-004

Tuesday, September 18, 2007

DONALD C. LIDDELL, P.C. DOUGLAS & LIDDELL 2928 2ND AVENUE SAN DIEGO, CA 92103 R.06-03-004 KAREN LINDH LINDH & ASSOCIATES 7909 WALERGA ROAD, NO. 112, PMB119 ANTELOPE, CA 95843 R.06-03-004 STEVEN G. LINS CITY OF GLENDALE 613 EAST BROADWAY, SUITE 220 GLENDALE, CA 91206-4394 R.06-03-004

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JODY S. LONDON JODY LONDON CONSULTING PO BOX 3629 OAKLAND, CA 94609 R.06-03-004

DICK LOWRY 5901 BOLSA AVENUE HUNTINGTON BEACH, CA 92647 R.06-03-004 JANE E. LUCKHARDT ATTORNEY AT LAW DOWNEY BRAND LLP 555 CAPITOL MALL, 10TH FLOOR SACRAMENTO, CA 95814 R.06-03-004

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PACYINZ LYFOUNG GREATER FRESNO HEALTH ORGANIZATION 3128 LAKELAND AVENUE, APT. 2 MADISON, WI 53704 R.06-03-004 Jaclyn Marks
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R.06-03-004

THOMAS J. MACBRIDE, JR. ATTORNEY AT LAW GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.06-03-004

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MARK MAH CEO GLU NETWORKS, INC. 440 N WOLFE ROAD SUNNYVALE, CA 94085 R.06-03-004

CAROL MANSON SAN DIEGO GAS & ELECTRIC CO. CP32D 8330 CENTURY PARK COURT SAN DIEGO, CA 92123 R.06-03-004

CHARLES MANZUK SAN DIEGO GAS & ELECTRIC 8330 CENTURY PARK COURT, CP 32D SAN DIEGO, CA 92123 R.06-03-004

JASMIN MARSTON 660 J STREET, SUITE 270 SACRAMENTO, CA 95814 R.06-03-004 CHRISTOPHER J. MAYER MODESTO IRRIGATION DISTRICT PO BOX 4060 MODESTO, CA 95352-4060 R.06-03-004

Tuesday, September 18, 2007

MICHAEL MAZUR CHIEF TECHNICAL OFFICER 3 PHASES RENEWABLES, LLC 2100 SEPULVEDA BLVD., SUITE 37 MANHATTAN BEACH, CA 90266 R.06-03-004 KEITH MC CREA ATTORNEY AT LAW SUTHERLAND, ASBILL & BRENNAN 1275 PENNSYLVANIA AVENUE, NW WASHINGTON, DC 20004-2415 R.06-03-004 ANDREW MCALLISTER DIRECTOR OF OPERATIONS CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVE., SUITE 100 SAN DIEGO, CA 92123 R.06-03-004

RICHARD MCCANN, PH.D M.CUBED 2655 PORTAGE BAY, SUITE 3 DAVIS, CA 95616 R.06-03-004 KARLY MCCRORY SOLAR DEVELOPMENT, INC. 5420 DOUGLAS BLVD. SUITE F GRANITE BAY, CA 95746 R.06-03-004 JAN MCFARLAND AMERICANS FOR SOLAR POWER 1100 11TH STREET, SUITE 323 SACRAMENTO, CA 95814 R.06-03-004

PHILLIP MCLEOD LAW & ECONOMICS CONSULTING GROUP 2000 POWELL STREET, STE 600 EMERYVILLE, CA 94608 R.06-03-004 RACHEL MCMAHON CEERT 1100 11TH STREET, SUITE 311 SACRAMENTO, CA 95814 R.06-03-004 JAMES MCTARNAGHAN ATTORNEY AT LAW DUANE MORRIS ONE MARKET, SPEAR TOWER, SUITE 2000 SAN FRANCISCO, CA 94105 R.06-03-004

ELENA MELLO SIERRA PACIFIC POWER COMPANY 6100 NEIL ROAD RENO, NV 89520 R.06-03-004 LIZ MERRY NORCAL SOLAR ENERGY ASSOCIATION PO BOX 3008 BERKELEY, CA 94703 R.06-03-004 LIZ MERRY EXECUTIVE DIRECTOR NORCAL SOLAR 2402 WESTERNESSE RD. DAVIS, CA 95616 R.06-03-004

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660 J STREET, SUITE 270
SACRAMENTO, CA 95814
R.06-03-004

SANFORD MILLER CALIFORNIA ENERGY COMMISSION 1516 NINTH STREET, MS 45 SACRAMENTO, CA 95814 R.06-03-004 STEPHEN MILLER STRATEGIC ENERGY INNOVATIONS 185 N. REDWOOD DRIVE, SUITE 188 SAN RAFAEL, CA 94903 R.06-03-004

KAREN NORENE MILLS ATTORNEY AT LAW CALIFORNIA FARM BUREAU FEDERATION 2300 RIVER PLAZA DRIVE SACRAMENTO, CA 95833 R.06-03-004 Jay Morse CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 4209 SAN FRANCISCO, CA 94102-3214 R.06-03-004 JOELENE MONESTIER MANAGER, COMMERCIAL PROJECT DEVELOPMENT SPG SOLAR, INC. 863 E. FRANCISCO BLVD., SUITE A SAN RAFAEL, CA 94901 R.06-03-004

Tuesday, September 18, 2007

MICHAEL D. MONTOYA ATTORNEY AT LAW SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R.06-03-004 RONALD MOORE GOLDEN STATE WATER/BEAR VALLEY ELECTRIC 630 EAST FOOTHILL BLVD. SAN DIMAS, CA 91773 R.06-03-004 STEPHEN A. S. MORRISON ATTORNEY AT LAW CITY AND COUNTY OF SAN FRANCISCO 1 DR. CARLTON B. GOODLETT PLACE, RM 234 SAN FRANCISCO, CA 94102 R.06-03-004

GREGG MORRIS DIRECTOR GREEN POWER INSTITUTE 2039 SHATTUCK AVENUE, STE 402 BERKELEY, CA 94704 R.06-03-004

DAVID MORSE 1411 W, COVELL BLVD., SUITE 106-292 DAVIS, CA 95616-5934 R.06-03-004 THERESA L. MUELLER ATTORNEY AT LAW SAN FRANCISCO CITY ATTORNEY CITY HALL, ROOM 234 SAN FRANCISCO, CA 94102-4682 R.06-03-004

SUSAN MUNVES ENERGY AND GREEN BLDG. PROG. ADMIN. CITY OF SANTA MONICA 1212 5TH STREET, FIRST FLOOR SANTA MONICA, CA 90401 R.06-03-004 MEGAN MACNEIL MYERS ATTORNEY AT LAW LAW OFFICES OF MEGAN MACNEIL MYERS PO BOX 638 LAKEPORT, CA 95453 R.06-03-004 SARA STECK MYERS ATTORNEY AT LAW LAW OFFICES OF SARA STECK MYERS 122 - 28TH AVENUE SAN FRANCISCO, CA 94121 R.06-03-004

PAUL NAHI CHIEF EXECUTIVE OFFICER PVI SOLUTIONS, INC. 201 FIRST STREET, SUITE 111 PETALUMA, CA 94952 R.06-03-004

PAYAM NARVAND CALIFORNIA ENERGY COMMISSION 1516 NINTH STREET, MS -45 SACRAMENTO, CA 95814 R.06-03-004 JESSICA NELSON PLUMAS-SIERRA RURAL ELECTRIC CO-OP 73233 HIGHWAY 70 STE A PORTOLA, CA 96122-2000 R.06-03-004

DAVID NEMTZOW 1254 9TH STREET, NO. 6 SANTA MONICA, CA 90401 R.06-03-004 ALYSSA NEWMAN SOLARCITY 393 VINTAGE PARK DRIVE, SUITE 140 FOSTER CITY, CA 94404 R.06-03-004 SEPHRA A. NINOW POLICY ANALYST CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVENUE, SUITE 100 SAN DIEGO, CA 92123 R.06-03-004

KAREN NOTSUND ASSISTANT DIRECTOR UC ENERGY INSTITUTE 2547 CHANNING WAY 5180 BERKELEY, CA 94720-5180 R 06-03-004

ARLEEN NOVOTNEY 941 PALMS BLVD. VENICE, CA 90291 R.06-03-004 CHRISTOPHER O'BRIEN SHARP SOLAR VP STRATEGY AND GOVERNMENT RELATIONS 3808 ALTON PLACE NW WASHINGTON, DC 20016 R.06-03-004

Tuesday, September 18, 2007

YONAH OFFNER 1176 BELMONT TERRACE VISTA, CA 92084 R.06-03-004 NATHALIE OSBORN PROJECT MANAGER CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVE., SUITE 100 SAN DIEGO, CA 92123 R.06-03-004

DAI OWEN 607 VIA CASITAS GREENBRAE, CA 94904 R.06-03-004

Lisa Paulo CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-03-004 NANCY J. PADGETT LAWRENCE BERKERLY NATIONAL LABORATORY 1 CYCLOTRN ROAD BERKELEY, CA 94720 R.06-03-004

TERENCE PARKER UNITED SOLAR OVONIC, LLC 3800 LAPEER ROAD AUBURN HILLS, MI 48326 R.06-03-004

LAURIE PARK NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R.06-03-004 STEVEN D. PATRICK ATTORNEY AT LAW SOUTHERN CALIFORNIA GAS/SDG&E 555 WEST 5TH STREET, GT14E7 LOS ANGELES, CA 90013-1034 R.06-03-004

NORMAN A. PEDERSEN HANNA AND MORTON, LLP 444 SOUTH FLOWER STREET, SUITE 1500 LOS ANGELES, CA 90071-2916 R.06-03-004

ROGER PELOTE WILLIAMS POWER COMPANY 12736 CALIFA STREET VALLEY VILLAGE, CA 91607 R.06-03-004 JANIS C. PEPPER CLEAN POWER MARKETS, INC. PO BOX 3206 LOS ALTOS, CA 94024 R.06-03-004 DAN PERKINS ENERGY SMART HOMES 983 PHILLIPS ST. VISTA, CA 92083 R.06-03-004

JOHN PERLIN 102 NORTH HOPE AVENUE, 80 SANTA BARBARA, CA 93110 R.06-03-004 LEIF RONNIE PETTERSSON CHIEF TECHNOLOGY OFFICER ENERGY RECOMMERCE INC. 116E OLIVA COURT NOVATO, CA 94947-2116 R.06-03-004 ROBERT L. PETTINATO LOS ANGELES DEPARTMENT OF WATER & POWER 111 NORTH HOPE STREET, SUITE 1150 LOS ANGELES, CA 90012 R.06-03-004

PHILIP D. PETTINGILL CALIFORNIA INDEPENDENT SYSTEM OPERATOR 151 BLUE RAVINE ROAD FOLSOM, CA 95630 R.06-03-004

BARBARA PICKERING 349 HILLSIDE DRIVE BOULDER CREEK, CA 95006 R.06-03-004 GORDON PICKERING PRINCIPAL NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R.06-03-004

Tuesday, September 18, 2007

JACK PIGOTT OPTISOLAR, INC 31302 HUNTSWOOD AVENUE HAYWARD, CA 94544 R.06-03-004

H. CLINTON PORTER KACO SOLAR, INC 1002 B OREILLY AVENUE SAN FRANCISCO, CA 94129 R.06-03-004

DANIELLE PRALL SOLAR POWER, INC. 813 14TH ST., STE. B GOLDEN, CO 80401 R.06-03-004

SHILPA RAMALYA 77 BEALE STREET, ROOM 981 SAN FRANCISCO, CA 94105 R.06-03-004

ERIN RANSLOW NAVIGANT CONSULTING, INC. 3100 ZINFANDEL DRIVE, SUITE 600 RANCHO CORDOVA, CA 95670-6078 R.06-03-004

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LAUREN S. PURNELL PACIFIC GAS AND ELECTRIC COMPANY 77 BEALE STREET, MC B29J SAN FRANCISCO, CA 94105 R.06-03-004

BOB RAMIREZ ITRON, INC. (CONSULTING & ANALYSIS DIV.) 11236 EL CAMINO REAL SAN DIEGO, CA 92130 R.06-03-004

MARK RAWSON SACRAMENTO MUNICIPAL UTILITY DISTRICT 6201 S STREET, MS B257 SACRAMENTO, CA 95817 R.06-03-004

HEATHER J. RICHMAN STANDFORD UNIVERSITY UNIVERSITY OF PUBLIC AFFAIRS BLDG. 170 STANFORD, CA 94305 R.06-03-004 TED POPE DIRECTOR COHEN VENTURES, INC./ENERGY SOLUTIONS 1738 EXCELSIOR AVENUE OAKLAND, CA 94602 R.06-03-004

Terrie D Prosper CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5301 SAN FRANCISCO, CA 94102-3214 R.06-03-004

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EDWARD RANDOLPH ASM LEVINE'S OFFICE ASSEMBLY COMMITTEE/UTILITIES AND COMMERC STATE CAPITOL ROOM 5136 SACRAMENTO, CA 95814 R.06-03-004

Amy Reardon CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-03-004

THEODORE E. ROBERTS ATTORNEY SAN DIEGO GAS & ELECTRIC COMPANY 101 ASH STREET, HQ 13D SAN DIEGO, CA 92101-3017 R.06-03-004

Tuesday, September 18, 2007

DONALD B. ROOKER BEAR VALLEY ELECTRIC SERVICE PO BOX 1547 BIG BEAR LAKE, CA 92315 R.06-03-004 TIM ROSENFELD HMW INTERNATIONAL INC. 131 CAMINO ALTO, SUITE D MILL VALLEY, CA 94941 R.06-03-004 BOBAK ROSHAN LEGAL ASSOCIATE THE GREENLINING INSTITUTE 1918 UNIVERSITY STREET, 2ND FLOOR BERKELEY, CA 94704 R.06-03-004

J P ROSS VICE PRESIDENT STRATEGIC RELATIONS SUNGEVITY 1625 SHATTUCK AVE., STE 21-BERKELEY, CA 94709 R 06-03-004 KATE ROWLAND CONTRACT ADMINISTRATOR SUN LIGHT AND POWER 1035 FOLGER AVENUE BERKELEY, CA 94710 R.06-03-004

ROBERT RYNEARSON 2132 BELLOC COURT SAN DIEGO, CA 92109 R.06-03-004

R. OLIVIA SAMAD SOUTHERN CALIFORNIA EDISON COMPANY 2244 WALNUT GROVE AVENUE ROSEMEAD, CA 91770 R.06-03-004 Don Schultz CALIF PUBLIC UTILITIES COMMISSION 770 L STREET, SUITE 1050 RM. SCTO SACRAMENTO, CA 95814 R.06-03-004 Andrew Schwartz CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5119 SAN FRANCISCO, CA 94102-3214 R.06-03-004

MICHAEL SCHEIBLE DEPUTY EXECUTIVE OFFICER CALIFORNIA AIR RESOURCES BOARD 1001 I STREET SACRAMENTO, CA 95677 R.06-03-004

REED V. SCHMIDT BARTLE WELLS ASSOCIATES 1889 ALCATRAZ AVENUE BERKELEY, CA 94703-2714 R.06-03-004 VINCENT SCHWENT CALIFORNIA SOLAR ENERGY INDUSTRIES ASSN. 3013 OYSTER BAY AVENUE DAVIS, CA 95616 R.06-03-004

MATT SCULLIN VICE PRESIDENT NEW RESOURCE BANK 405 HOWARD STREET, SUITE 110 SAN FRANCISCO, CA 94105 R.06-03-004 Polly N. Shaw CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-03-004 ELLEN SHAFNER SOLEL, INC. 701 NORTH GREEN VALLEY PARKWAY, STE. 200 HENDERSON, NV 89074 R.06-03-004

MICHAEL SHAMES ATTORNEY AT LAW UTILITY CONSUMERS' ACTION NETWORK 3100 FIFTH AVENUE, SUITE B SAN DIEGO, CA 92103 R 06-03-004 GOPAL SHANKER PRESIDENT RECOLTE ENERGY 3901 LAKE COUNTY HIGHWAY CALISTOGA, CA 94515 R.06-03-004 KENT SHELDON COMMERCIAL SALES MANAGER SMA AMERICA, INC. 12438 LOMA RICA DRIVE GRASS VALLEY, CA 95945 R.06-03-004

Tuesday, September 18, 2007

Anne E. Simon CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE ROOM 5024 SAN FRANCISCO, CA 94102-3214 R.06-03-004

KEVIN J. SIMONSEN ENERGY MANAGEMENT SERVICES 646 EAST THIRD AVENUE DURANGO, CO 81301 R.06-03-004 GEORGE SIMONS
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KARI SMITH POWERLIGHT CORPORATION 2954 SAN PABLO AVENUE BERKELEY, CA 94706 R.06-03-004

KRISTEN F. SOARES 1800 I STREET SACRAMENTO, CA 95814 R.06-03-004 K. SCOTT SON VICE PRESIDENT NEW RESOURCE BANK 405 HOWARD ST., SUITE 110 SAN FRANCISCO, CA 94105 R.06-03-004 JAMES D. SQUERI ATTORNEY AT LAW GOODIN MACBRIDE SQUERI DAY & LAMPREY 505 SANSOME STREET, SUITE 900 SAN FRANCISCO, CA 94111 R.06-03-004

SEEMA SRINIVASAN ATTORNEY AT LAW ALCANTAR & KAHL, LLP 120 MONTGOMERY STREET, SUITE 2200 SAN FRANCISCO, CA 94104 R.06-03-004 Merideth Sterkel CALIF PUBLIC UTILITIES COMMISSION 505 VAN NESS AVENUE AREA 4-A SAN FRANCISCO, CA 94102-3214 R.06-03-004

JUDY STALEY REC SOLAR, INC. 684 CLARION COURT SAN LUIS OBISPO, CA 93401 R.06-03-004

IRENE M. STILLINGS EXECUTIVE DIRECTOR CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVE., STE. 100 SAN DIEGO, CA 92123 R.06-03-004

KIRK STOKES SOLAR POWER, INC. 813 14TH ST., STE. B GOLDEN, CO 80401 R 06-03-004 NEHEMIAH STONE DIRECTOR OF DSM IMPLEMENTATION KEMA SERVICES, INC. 492 NINTH STREET, SUITE 220 OAKLAND, CA 94607 R.06-03-004

MARK STOUT
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NINA SUETAKE THE UTILITY REFORM NETWORK 711 VAN NESS AVE., STE 350 SAN FRANCISCO, CA 94102 R.06-03-004 JOHN SUPP PROGRAM MANAGER CALIFORNIA CENTER FOR SUSTAINABLE ENERGY 8690 BALBOA AVENUE, SUITE 100 SAN DIEGO, CA 92123 R.06-03-004

Tuesday, September 18, 2007

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